

**IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION**

**VICTOR SMITH,****Plaintiff,****vs.****EURO-PRO MANAGEMENT  
SERVICES, INC.,****Defendant.****Case No. 3:05-cv-1186-MEF**

**PLAINTIFF'S EXHIBIT LIST**

Comes now the Plaintiff and gives notice that he expects to call the following persons as witnesses at trial of the above styled action:

**EXHIBIT**

| <b><u>NO.</u></b> | <b><u>DESCRIPTION</u></b>  | <b><u>OFFERED</u></b> | <b><u>ADMITTED</u></b> |
|-------------------|--|-----------------------|------------------------|
| 1                 | Resume of Victor Smith<br>(Plaintiff's Exhibit "3" to Hudnall depo.)               | _____                 | _____                  |
| 2                 | Position description of Smith's Job<br>(Plaintiff's Exhibit "4" to Hudnall depo.)  | _____                 | _____                  |
| 3                 | Employee Evaluation dated 8/31/2004<br>(Plaintiff's Exhibit "5" to Hudnall depo.)  | _____                 | _____                  |
| 4                 | Employment Evaluation dated 5/5/2004<br>(Plaintiff's Exhibit "6" to Hudnall depo.) | _____                 | _____                  |
| 5                 | W-2 of Plaintiff for 2004<br>(Plaintiff's Exhibit "7" to Hudnall depo.)            | _____                 | _____                  |
| 6                 | W-2 of Plaintiff for 2003<br>(Plaintiff's Exhibit "7" to Hudnall depo.)            | _____                 | _____                  |

**EXHIBIT**

| <b>NO.</b> | <b>DESCRIPTION</b>  | <b>OFFERED</b> | <b>ADMITTED</b> |
|------------|---|----------------|-----------------|
| 7          | Document prepared by Terry Robertson in connection with termination of Plaintiff's employment<br>(Plaintiff's Exhibit "8" to Hudnall depo.) | _____          | _____           |
| 8          | Emails between Plaintiff and Chad Reese<br>(Plaintiff's Exhibit "9" to Hudnall depo.)   | _____          | _____           |
| 9          | Drawing of steam cleaner life test fixture  | _____          | _____           |
| 10         | Employee evaluation of Ashley Sheffield dated 8/04/2005<br>(produced by Defendant in discovery – Bates No. 0057-60)                         | _____          | _____           |
| 11         | Email from Francine Rosenzweig to Yigal Offir sent 7/05/2006<br>(produced by Defendant in discovery – Bates No. 61)                         | _____          | _____           |

/s/John I. Cottle III  
 John I. Cottle III (COT004)  
 Attorney for Plaintiff

OF COUNSEL:  
 Bowles & Cottle  
 Attorneys at Law  
 P.O. Box 780397  
 2 South Dubois Avenue  
 Tallahassee, Alabama 36078  
 (334) 283-6548  
 Fax: (334) 283-5366  
 (Email) [BowlesandCottle@aol.com](mailto:BowlesandCottle@aol.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on February 16, 2007, I electronically filed the foregoing with the Clerk of Court using the CM/EMF system which will send notification of such filing to the following:

Warren B. Lightfoot, Jr., Esq.  
Maynard, Cooper & Gale, P.C.  
1901 Sixth Avenue North  
2400 AmSouth/Harbert Plaza  
Birmingham, Alabama 35203-2618

/s/ John I. Cottle III  
Of Counsel